

The FISTS petition, RM-10811, lays out a number of excellent reasons why Morse Code is important to the Amateur Radio Service. I strongly support the preservation and promotion of CW as a mode of communication. However, the changes to regulations proposed in the FISTS petition will complicate the licensing structure and band plans with no clear benefit other than to embed Morse Code deeper into the regulations governing our Service. FISTS and other organizations are more than sufficient, in and of themselves, to guarantee the continued interest and survival of Morse Code as an operating mode in the Amateur Radio Service. Eliminating Element 1 and all testing requirements for Morse Code proficiency for all classes of Amateur Radio Operators will not bring about the end of Morse Code as an operating mode. Amateurs will still be attracted to this mode just as they are to phone, RTTY, PSK31 and other modes. There is no reason to test people for proficiency in Morse Code, just as there is no reason to test people for proficiency in any other mode, to earn an Amateur Radio Operator's licence. Each mode has well known strengths and weaknesses that will benefit operators under specific conditions. The current requirement for Morse Code testing, Element 1, places an unnecessary burden on the VECs and limits the number of applicants for higher classes of licenses; code testing hinders rather than helps the hobby. To provide the greatest benefit to the Amateur Radio Service and to simplify our regulations, turn down RM-10811 and eliminate all requirements for Morse Code testing as proposed by the VECs in their Petition for Rulemaking. The number of licensed amateurs will increase and Morse Code will still be used by thousands of amateurs in every part of the country.

R. Mark Jones, N5RMJ